

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

XO Illinois, Inc. and Allegiance Telecom)	
of Illinois Inc.)	
)	
vs.)	
)	
Illinois Bell Telephone Company,)	Docket No. 05-0156
d/b/a SBC Illinois)	
)	
In the Matter of a Complaint)	
Pursuant to 220 ILCS 5/13-515,)	

**MOTION TO FOR LEAVE TO FILE REPLY OF JOINT PETITIONERS TO SBC
ILLINOIS' APPLICATION FOR REHEARING**

Now Come XO Illinois, Inc., and Allegiance Telecom of Illinois, Inc. ("XO and Allegiance"), and as their Motion for Leave to File Reply to SBC Illinois' Application for Rehearing ("Application"), state as follows:

1. On March 9, 2005 the Administrative Law Judge entered an Order Granting Emergency Relief. Two days later, pursuant to Section 13-515 of the Public Utilities Act (220 ILCS 5/13-515(e), that order became the order of the Commission when the Commission decided not to reverse or modify that order.
2. On March 15, 2005, SBC Illinois filed an Application for Rehearing of the order granting emergency relief.
3. The primary argument made by SBC in its Application for Rehearing is an entirely new argument not raised by SBC in any previous pleading. SBC argues that the order granting emergency relief should be reversed because SBC has issued a new Accessible Letter that

makes the requested relief moot. XO and Allegiance should be able to address this issue because they have not had an opportunity to address it before and could not have anticipated when they filed their one and only brief in this case, their brief in support of the emergency motion.

Wherefore, for the foregoing reasons, XO Illinois, Inc., and Allegiance Telecom of Illinois, Inc. request leave to file a brief responding to SBC's Application for Rehearing.

Dated: March 21, 2005

Respectfully submitted,

/s/ Stephen J. Moore

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the MOTION TO FOR LEAVE TO FILE REPLY OF JOINT PETITIONERS TO SBC ILLINOIS' APPLICATION FOR REHEARING has been served upon the parties listed on the attached service list on March 21, 2005, by electronic mail.

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